

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

CNH Industrial Capital America LLC,

Plaintiff,

v.

Keith K. Johnson, and Unity Bank, f/k/a  
Unity Bank East,

Defendants.

Case No.:18-cv-02795-PJS-DTS

**MOTION FOR AN ORDER FOR  
SEIZURE AND DELIVERY OF  
PROPERTY PURSUANT TO  
FED. R. CIV. P. 64 AND  
MINN. STAT. § 565.23**

Plaintiff CNH Industrial Capital America LLC (“CNH”) hereby moves the Court for an order pursuant to Fed. R. Civ. P. 64 and Minnesota Statute § 565.23, et seq. This motion is based on CNH’s Notice of Hearing, Memorandum in Support of Motion for an Order for Seizure and Delivery of Property, the Affidavit of Greg Arkatin, and supporting exhibits filed with this motion, together with all pleadings, records, and arguments of counsel to date.

**STINSON LEONARD STREET LLP**

Dated: October 3, 2018

By: *s/ Benjamin J. Court*

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